

**CONTRA COSTA  
WATER DISTRICT**

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September 12, 2003

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Sacramento, CA 95825

Ms. Delores Brown  
Department of Water Resources  
3251 S Street  
Sacramento, CA 95816

**Subject: Contra Costa Water District Comments on Environmental Water Account  
Draft EIS/EIR**

Dear Ms. Cervantes and Ms. Brown:

The Contra Costa Water District (CCWD) appreciates this opportunity to comment on the Environmental Water Account (EWA) Draft Environmental Impact Statement (EIS)/Environmental Impact Report (EIR).

CCWD is a public water supply agency serving approximately 450,000 people in central and eastern Contra Costa County, with a vital interest in protecting the quality and reliability of its water supply. A description of CCWD's facilities and operations is attached.

CCWD has reviewed the water quality sections of the EWA Draft EIR/EIS. The document acknowledges that one of the primary objectives of CALFED is to improve the water quality received by urban water users from the Delta. CCWD agrees with the Draft EIR/EIS's statement that any degradation of in-Delta water quality would be contrary to EWA and CALFED objectives and would be an adverse effect.

The Draft EIR/EIS concludes that because EWA agencies (Project Operators) will use carriage water, Delta water quality conditions will remain unchanged by increased export pumping during certain periods under the Preferred Alternative (Draft EIR/EIS pg. 5-92). This conclusion is flawed. Carriage water is not used by Project Operators as a mechanism to maintain chloride concentrations in the Delta, it is used to meet State Board D-1641 water quality standards. Project Operators do not use carriage water when water quality standards are not governing. Thus, when a water quality standard is not governing, increased exports can degrade Delta water quality, particularly drinking water quality for CCWD and other users of Delta water.

The EIR must disclose the impacts of this degradation in water quality on urban water users who rely on water from the Delta. Chapter 5 of the EIR/EIS must be revised to clarify that Project Operators use carriage water to meet water quality standards in the Delta, but that this does not prevent adverse changes in water quality conditions during periods when water quality standards are not governing. The language in the EIR/EIS stating that carriage water "maintains chloride concentrations in the Delta" must be deleted unless Project Operators intend to commit to altering their current use of carriage water to prevent all water quality degradation, not just to meet standards.

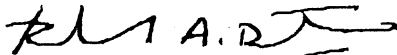
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Contra Costa Water District Comments on Environmental Water Account Draft EIS/EIR  
September 12, 2003  
Page 2

Recognizing and disclosing all water quality impacts is important for CALFED so that CALFED can move forward with its program in a balanced way. Such recognition and disclosure is consistent with the Drinking Water Policy Framework recommendation adopted by the Bay-Delta Public Advisory Committee. That policy framework calls for an analysis and report on water quality changes that can affect drinking water, mitigation where feasible, and where not feasible, a bundling of projects by CALFED to ensure continuous improvement in water quality for all beneficial uses, consistent with the CALFED program goals.

CCWD recognizes that the EWA is a valuable tool that may assist in fish population recovery and reduce uncertainty in water supply deliveries associated with fish recovery actions. The changes in timing and amount of pumping associated with the EWA can result in water quality changes in the Delta that impact Delta water users. Thus CCWD supports bundling the EWA with other projects that, when implemented at the same time as the EWA, will result in a net improvement in Delta water quality, consistent with CALFED's water quality goal.

If you have any questions or would like to discuss this issue further, please contact me at (925) 688-8187 or by email at [rdenton@ccwater.com](mailto:rdenton@ccwater.com).

Sincerely,



Richard A. Denton  
Water Resources Manager

RAD/SAS:wec

Attachment: Contra Costa Water District Facilities and Operations

cc: Jerry Johns (DWR)